

**IN THE UNITED DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

UNITED STATES OF AMERICA
Plaintiff,

v.

GEORGIANNA A.M. GIAMPIETRO
Defendant.

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Case No.: 2:19-cr-00013

Chief Judge Waverly D. Crenshaw, Jr.

**DEFENDANT’S MOTION FOR LEAVE TO FILE A SEVEN-PAGE REPLY BRIEF IN
SUPPORT OF HER MOTION TO EXCLUDE EXPERT TESTIMONY OF MIA BLOOM**

Pursuant to LR7.01(a)(4), Defendant Georgianna Giampietro requests that the Court allow her two additional pages to reply to the government’s Opposition (Doc. 361) to the *Daubert* Motion to Exclude Expert Testimony of Mia Bloom (Doc. 325). The Opposition raises several issues necessitating a response. Ms. Giampietro seeks seven pages to respond to four of them.

The first two issues go to the crux of the *Daubert* Motion: (1) whether Dr. Bloom’s testimony is inadmissible profile evidence, and (2) if not, whether her testimony satisfies Federal Rules of Evidence 702 and 403. The second two issues, while of less overall significance, involve new or unanticipated arguments: (1) whether Dr. Bloom should be permitted to testify about *takiya* because, according to the government, “[*takiya*] could explain why the defendant behaved one way in public and another way with her online associates and friends”; and (2) whether Dr. Bloom should be permitted to testify about Foreign Terrorist Organization (“FTO”) recruitment of Western female converts as support for the government’s argument that Ms. Giampietro is herself an FTO recruiter.

Accordingly, Ms. Giampietro requests leave to file a seven-page reply so that she may address the four issues identified above. Should the Court deny this Motion, Ms. Giampietro is prepared to limit her reply to the first two issues within five pages.

Respectfully submitted,

By: /s/ Charles Swift
Charles D. Swift,
Pro Hac Attorney for Giampietro
CLCMA
100 N. Central Expy, Suite 1010
Richardson, TX 75080
(972) 914-2507

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 7th day of January, 2022, I electronically filed the foregoing Motion for Leave to File a Seven Page Reply with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to all counsel of record.

By: /s/ Charles Swift
Charles D. Swift, Pro Hac
Attorney for Giampietro
100 N. Central Expy, Suite 1010
Richardson, TX 75080